

FILED

SEP 07 2005


CLERK

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
WESTERN DIVISION

TAMARA STAR COMES OUT, a/k/a)	
TAMARA STAR,)	Civil No. <u>05-5075</u>
)	
Plaintiff,)	
)	SEPARATE ANSWER OF
-vs-)	VISTA STAFFING SOLUTIONS, INC.
)	
MOHAMMED AHSAN and VISTA)	
STAFFING SOLUTIONS, INC.,)	
)	
Defendants.)	

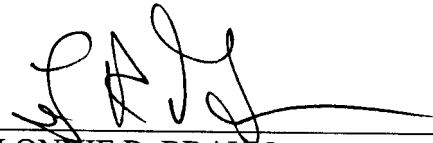
Vista Staffing Solutions, Inc. ("Vista"), through undersigned counsel, answers Plaintiff's Complaint:

1. Vista denies each and every allegation, matter and thing in Plaintiff's Complaint, except those matters specifically admitted in this Answer.
2. Vista is a Utah corporation headquartered in Salt Lake City, Utah, that contracts with healthcare facilities and physicians for *locum tenens* services.
3. Vista admits that it contracted with Pine Ridge IHS and Mohammad Ahsan, M.D. to provide physician coverage at Pine Ridge IHS Hospital during the applicable time.
4. Vista denies that it was negligent; that any wrongful conduct by Vista legally caused harm to Plaintiff; and puts Plaintiff to strict proof of her alleged damages.
5. Plaintiff's Complaint and each count in it fail to state claims against Vista upon which relief can be granted.

WHEREFORE, Vista prays for judgment dismissing Plaintiff's Complaint on its merits and with prejudice and

GRANTING Vista its costs in defending this action.

Dated this 7 day of September, 2005.



LONNIE R. BRAUN
Attorneys for Defendant
THOMAS NOONEY BRAUN SOLAY
& BERNARD, LLP
1301 Omaha Street, Suite 224
P. O. Box 8108
Rapid City, SD 57709-8108
(605) 348-7516

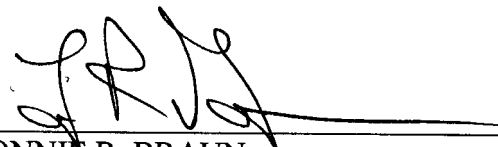
VISTA HEREBY DEMANDS TRIAL BY JURY

CERTIFICATE OF SERVICE

I, Lonnie R. Braun, attorney for Defendants, hereby certify that a true and correct copy of the within and foregoing Separate Answer of Vista Staffing Solutions, Inc. was mailed by first-class mail, postage prepaid thereon, to the following:

Michael A. Wilson
Barker, Wilson, Reynolds & Burke, LLP
P. O. Box 9335
Rapid City, SD 57709-9335

by depositing the same in the United States Post Office at Rapid City, South Dakota, this 7th day of September, 2005.



LONNIE R. BRAUN